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 File:NPCD/FOB;CHRON-READING;AUTHOR:/Letter to Bill Guerry (SMA)  
 RE: Scrap metal question and answers

MAR 18 2001

William Guerry  
 Collier Shannon Scott, PLLC  
 Washington Harbour, Suite 400  
 3050 K Street, NW  
 Washington, DC 20007

Dear Mr. Guerry:

This letter is in response to your request that we revise portions of the PCB Question and Answer manuals that pertain to scrap metal recycling. Over the past several months we have been working closely with the Steel Manufacturers Association (SMA) to revise and clarify these issues. We have enclosed a courtesy copy of the Agency's final version of the questions and answers that pertain to the issues you raised. These questions and answers will be included in Part 5 of the PCB Question and Answer manual. We are currently working on Part 4 of the PCB Question and Answer manual; work on Part 5 of the manual will begin only after Part 4 has been completed.

If you have any questions pertaining to this matter, please contact Laura Casey at (202) 260-1346 or Sara McGurk at (202) 260-1107.

Sincerely,

*15/ Margaret Reynolds*  
*for*  
 Tony Baney, Chief  
 Fibers and Organics Branch

Enclosure

## CONCURRENCES

SYMBOL	7404	7404						
SURNAME	SMcGurk	Reynolds						
DATE	3/6/01	3/7/01						

**Q:** *My facility recovers scrap metal from automobiles and white goods. Is my facility required to comply with the TSCA PCB regulations?*

A: Yes, if the recycled automobiles or white goods contain PCBs  $\geq 50$  ppm and the regulated PCBs are not removed prior to shredding. PCBs can be found in a non-liquid state as part of manufactured items, such as paint or plastic, or in a liquid state in capacitors. EPA has provided for self-implementing decontamination procedures to remove or separate PCBs from metal prior to recycling the metal. Physically separating non-liquid PCB-containing waste from non-PCB-containing metal is a self-implementing decontamination activity that does not require an approval. Waste streams from this process may be regulated for disposal (see §761.62)

**Q:** *Is the scrap metal from the shredding of automobiles and appliances regulated for disposal under TSCA?*

A: No, as long as the feedstock material did not contain PCBs at concentrations  $\geq 50$  ppm and if the scrap metal no longer contains or is contaminated by regulated PCBs.

**Q:** *How can a facility reduce the likelihood that fluff will be contaminated with PCBs derived from feedstock materials containing liquid PCBs  $\geq 50$  ppm?*

A: By establishing and maintaining a source control program to ensure the removal of sources of regulated liquid PCBs, from the items being shredded. While a facility may rely on an independent source control program to demonstrate that liquid (or non-liquid) PCBs have been removed from feedstock materials, to be afforded the additional protection under §761.62(c), the facility must operate under a source control program approved by EPA.

**Q:** *Is the shredder residue regulated for disposal?*

A: Yes, if the feedstock material contained PCBs at concentrations  $\geq 50$  ppm.

**Q:** *My facility adds water to PCB Bulk Product Waste to physically separate metals from non-metal by flotation. Is this processing for disposal that requires an approval?*

A: No. Physically separating PCB-containing waste from non-PCB-containing waste (usually the metal component) is also a self-implementing decontamination activity that does not require an approval (see §761.79(a)). Waste streams from this process (including the water) may be regulated at the time of disposal, depending on their PCB content.